REMARKS

Claims 1-19 are pending. Claims 1-19 have been examined and rejected.

Item 1 indicates that the action be made final.

Items 2 and 3 reject claims 1-4, 6, 10-14, and 17 under 35 U.S.C. §103(a) as obvious over U.S. Patent No. 5,987,112 to Chakravarti *et al.*, "Chakravarti" hereinafter, in view of U.S. Patent No. 6,031,899 to Wu, "Wu" hereinafter.

Item 4 rejects claims 5, 7, 9, 15-16, and 18 under 35 U.S.C. §103(a) as obvious over Chakravarti in view of Wu and further in view of U.S. Patent No. 6,005,845 to Svenesson *et al.*, "Svenesson" hereinafter.

Item 5 rejects claims 8 and 19 under 35 U.S.C. §103(a) as obvious over Chakravarti in view of Wu and further in view of U.S. Patent No. 6,035,031 to Silverman, "Silverman" hereinafter. To advance prosecution, all rejections will be treated as though applied to the claims as amended. Applicants traverse the rejections and request reconsideration.

Chakravarti

The Office Action states:

> Regarding claim 1, Chakravarti et al teach the invention substantially as claimed. A method for providing an automated call connection system comprising the steps of:
> initiating a call back request from a first user to a second user (Fig 1 and col 2, ln 22-col 3 ln 45);
> sending the call back request from a first user to a second user (Fig 1 and col 2, ln 22-col 3 ln 45);
> receiving the call back request (Fig 1 and col 2, ln 22-col 3 ln 45);
> immediately and automatically attempting to connect the first user (Fig 1 and col 2, ln 22-col 3 ln 45).

Office Action, page 3, lines 1-9. Applicants would like to point out that the final step of Applicants' claim 1 is misquoted; it should be "if the second user accepts the call back request, immediately and automatically attempting to connect the first user **and the second user**." Claim 1, lines 6-7.

Chakravarti describes an international-call automatic callback system for use when placing international calls where a call in one direction is significantly cheaper than a call in the reverse direction. For example, a call from the United States to a foreign country is often significantly cheaper than a call from that foreign country to the United States. As described in Chakravarti, a system monitors the call of a subscriber placed (for example) from Brazil to the United States. Upon detection of an international code (for example, 01), the system immediately launches a call to a node in the subscriber's local exchange while retaining the digits dialed by the subscriber. The node signals a call-back service platform to launch a call back to the subscriber. The call-back service platform then launches a second call to the called party. The two calls are then bridged.

Applicants agree with the Patent Office's statement that "Chakravarti et al differ from claimed

invention in that it does not clearly point out the second user's choice of whether or not to accept a call back request." Office Action, page 3, lines 10-11. However, it is difficult to understand which elements in Chakravarti the Patent Office asserts correspond to elements in Applicants' claims. Chakravarti's called party cannot correspond to Applicants' second user because in Chakravarti, the callback request is never sent to the called party; it is handled transparently by the service provider. Nor can the service provider in Chakravarti correspond to Applicants' second user because Applicants' last step specifies that the system attempt to connect the first user and the second user, and in Chakravarti the caller is already connected to the service provider.

The Patent Office appears to be asserting that Chakravarti's local node corresponds to Applicants "first user" and the callback platform corresponds to Applicants' "second user." Applicants believe this reading does not hold up, but in any event, to advance prosecution, Applicants have further specified that the second user must have the capability to choose between accepting or rejecting the callback request. This clearly distinguishes over Chakravarti's system, in which the callback platform has no capability to choose. If a call back is requested, the callback platform attempts the call back. Accordingly, Chakravarti does not disclose or suggest elements of Applicants' claims.

Chakravarti's system is particularly directed to speeding up the callback system by having the callback initiated even before the call is completed. Also, the callback is completely automated: there is no process by which a callback can be selected or rejected. In contrast, Applicants' system requires the call recipient to select to call back the callback originator; upon selection, the system automatically calls back the callback originator.

The Combination of Chakravarti and Wu

Regarding Claim 1, the Office Action states:

> However, Wu teaches the caller ID associated with the call displayed at second user terminal such that the second user can decide whether or not to take the call (col 1, ln 48-56). Therefore, it would have been obvious to one skilled in the art to add the caller ID feature associated with the call displayed at second user terminal as taught by Wu to network of Chakravarti et al to achieve Applicant's claimed limitations.

Office Action, page 3, lines 12-16. Applicants disagree.

First as, has been discussed, Chakravarti does not disclose callbacks within the terms of Applicants' claims. Wu merely discusses a call recipient's deciding whether to answer a call based on Caller ID or other displayed information. Wu contains no teaching or disclosure regarding callbacks. In particular, since in the most generous reading of the Patent Office's position the callback **platform** is the second user, it is difficult to see how it would review a Caller ID to decide whether to accept a request.

In any event, the cited art gives no teaching, suggestion, disclosure, or motivation for combining Chakravarti and Wu or for modifying their teachings to yield the limitations of Applicants' claims. As has been discussed, Chakravarti is directed to economizing when placing international calls; neither Chakravarti nor Wu recognizes one of the problems addressed by Applicants' system: efficiently locating a called party who may be at any of several telephone numbers.

The Office Action also rejects claims 2-4, 6, 1-14, and 17 over Chakravarti in view of Wu substantially based on the rejection of claim 1. Applicants dispute the allegations of the Patent Office

regarding further teachings of Chakravarti, such as the use of a personal digital assistant to initiate call back requests; Applicants reiterate that the Patent Office's correspondence of Chakravarti's elements to Applicants' claim limitations is, at best, confused. In any event, Applicants believe these points to be moot in light of the claim amendments.

In sum, Applicants' claims 1-4, 6, 1-14, and 17 are nonobvious over Chakravarti and Wu for reasons including the following: Neither Chakravarti nor Wu discloses the elements of Applicants' claims; the art contains no teaching, disclosure, suggestion or motivation to modify the art to yield Applicants' claims; the art contains no teaching, disclosure, suggestion or motivation to combine Chakravarti with Wu; and neither Chakravarti nor Wu recognizes a problem addressed by the Applicants.

Svennesson

Item 4 rejects claims 5, 7, 9, 15-16, and 18 over Chakravarti in view of Wu and further in view of Svennesson. Svennesson is cited as supplying call back requests automatically sent via at least one of an E-mail message, a page, and a facsimile. Applicants disagree.

Svennesson states:

> It is another object of the present invention to enable an IP [intelligent peripheral] to initiate and control the set up of a call by the SCP [service control point] on a message channel. It is also an object of the present invention to facilitate the automation of the call set up process and to permit a subscriber to transfer or forward calls, to schedule a conference call or to make broadcasts of voice- or data messages without manual intervention. Yet another object of the

> present invention is to permit a subscriber to interactively or in advance request or prescribe a call set up without necessitating a call dialogue. **Such an arrangement will permit a subscriber to send a voice mail, a facsimile mail or an e-mail requesting a system callback to one or more identified or prespecified numbers at a specified time and/or for a specified duration.**

Svennesson, col. 6, lines 1-14 (emphasis added).

First of all, to clarify the context of the quoted passage, Svennesson's system is directed toward scheduling conference calls. Although the highlighted text includes the word "callback," it is a different sort of callback than that defined in Applicants' claims. As with Chakravarti, Svennesson's elements do not correspond to Applicants'. Presumably a human being is the callback initiator, and thus would correspond to Applicants' "first user." However, the request is going to the system, not to another person. The system does not have an independent capacity to reject the request.

Even if we imagine an advanced system that schedules conferences according to a scheduling algorithm and that thus can "reject" a request, the system would then correspond to Applicants' "second user;" but using these correspondences, Svennesson's "first user" does not want to be connected to the system but to a conference participant. Furthermore, Svennesson's system does not attempt immediate connection. Accordingly, Svennesson cannot be cited as teaching much more than that general communication and general requests can be made by fax, E-mail, and pager. In particular, Svennesson does not supply the limitations lacking in Chakravarti and Wu.

Silverman

Item 5 rejects claims 8 and 19 as obvious over Chakravarti in view of Wu and further in view

Silverman. Silverman does not supply the limitations lacking in Chakravarti in view of Wu. Accordingly, if independent claims 1 and 11 are allowable, dependent claims 8 and 19 are *a fortiori* allowable.

Conclusion

Applicants submit that their invention as claimed is not disclosed, taught, or suggested by the cited art. Therefore, it is submitted that all pending claims are allowable over the art of record and it is respectfully requested that the application be passed to allowance and issue.

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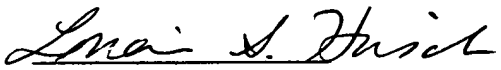
Respectfully submitted,



Lorraine S. Hirsch
Attorney for Applicant(s)
Reg. No. 35,545

Siemens Corporation
West Coast IPD, M/S 503
P.O. Box 58075
Santa Clara, CA 95052-8075
408/358-1572